

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
(Richmond Division)**

GREGORY THOMAS BERRY, et al.,

Plaintiffs,

v.

Civil Action No. 3:11CV754

**LEXISNEXIS RISK & INFORMATION
ANALYTICS GROUP, INC., et al.,**

Defendants.

**NOTICE OF INTENT TO REQUEST REDACTION OF FINAL
FAIRNESS HEARING TRANSCRIPT BY LEXISNEXIS
RISK & INFORMATION ANALYTICS GROUP, INC.**

Pursuant to the Court's February 7, 2014 Text Order and the Parties Stipulated Protective Order (Doc. 47), LexisNexis Risk & Information Analytics Group, Inc. ("LexisNexis"), by counsel, hereby provides notice that it intends to request redactions to the December 10, 2013 Final Fairness Hearing Transcript (Doc. 122).

LexisNexis specifically asks the Court to redact the following parts of the Final Fairness Hearing Transcript, with the beginning and end of each excerpt designated by a page and line reference. LexisNexis reserves the right to withdraw some or all of its requested redactions.

<u>From:</u>	<u>To:</u>
P. 13, L. 1	P. 14, L. 23.

This portion of the transcript contains information that the Court has previously allowed LexisNexis to keep confidential in these proceedings. In early March 2013, LexisNexis asked for leave to file under seal sensitive documents containing proprietary information regarding the amount of time, money, and other resources that it will have to expend to develop the suite of

products and services outlined in detail in the Settlement Agreement (Doc. 56). On March 14, 2013, the Court granted the motion and allowed LexisNexis to file the documents under seal (Doc. 58). The excerpt cited above contains the same proprietary information as those documents. For the reasons stated in LexisNexis's motion to file the prior documents under seal (Doc. 56), and the Court's memorandum order granting that motion (Doc. 58), the Court should redact the portions of the transcript cited above.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on the 12th day of March, 2014, I electronically filed the foregoing using the CM/ECF system, which will send notification of such filing to CM/ECF participants, and I hereby certify that I have mailed by United States Postal Service the document to the non-CM/ECF participants:

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